

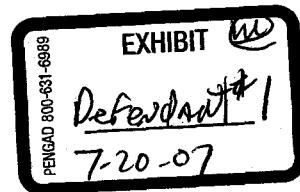
CONFIDENTIAL FAX

LAW OFFICE OF
C. Sukari Hardnett
1111 Bonifant Street
SILVER SPRING, MARYLAND 20910
s.hardnett@verizon.net
(301) 587-7001- OFFICE
(301) 587-7002 - FAX

DATE: July 17, 2007
TO: Rhonda Fields, Esq.
FROM: C. Sukari Hardnett
FAX: 202-514-8780
RE: Short v. Chertoff
Client: Short v. Chertoff
Number of Pages: 8 including cover

Ms. Fields:

Here are the Answers. Once again I would like to confirm that my Client will be available for deposition on Friday July 20, 2007. I would request that the time is changed to 10:00a.m. Please call me if this presents a problem.



IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GEORGE SHORT)	
)	
Plaintiff,)	CASE NO. <u>1:05-cv-01034-RMU</u>
v.)	
MICHAEL CHERTOFF)	
)	
Defendant.)	
)	

**PLAINTIFF'S ANSWERS TO DEFENDANT'S
ORIGINAL SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS**

To: Defendant, DHS, through it's attorney of record, Rhonda Fields, Assistant United States Attorney, Civil Division, 555 Fourth Street, N.W., Washington, D.C. 20530 .

From: Plaintiff, George Short, serves these answers to Defendant's interrogatories and Request for Production of Documents.

I.

ANSWERS

Interrogatory 1. Fully identify and describe each and every instance where you claim in your complaint that you were subjected to sex, age, race, color or reprisal discrimination or retaliation, by Department of Homeland Security ("DHS") employees or management officials, noting the alleged type of discrimination or retaliation, the date and location of the alleged act, all witnesses or parties to the incident, and what evidence you have to support your belief that discrimination or retaliation occurred.

Answer 1. Please See EEO Report of Investigation Case No. GSA-03-NCR-WPS-GSA-2 and GSA Case No. 03-NCR-WPS-GSA-14

Interrogatory 2. Fully identify and describe each and every adverse action of any type you suffered as a result of each act of alleged sex, age, race, color or reprisal discrimination, or reprisal or retaliation. With respect to these adverse actions, individually specify which of your causes of action (i.e. sex, age, race, color or reprisal) you believe caused the adverse action; why you believe that connection exists; and what, if any, evidence you have supporting your belief.

Answer 2. Please See EEO Report of Investigation Case No. GSA-03-NCR-WPS-GSA-2 and GSA Case No. 03-NCR-WPS-GSA-14

Interrogatory 3. As to each act of sex, age, race, color or reprisal discrimination or retaliation you allege occurred fully describe and identify your initial contact with an EEO counselor or with the EEOC including the date of the alleged act of discrimination, the date and location of initial contact, how the contact was made, with whom the contact was made, and any evidence substantiating when the initial contact was made.

Answer 3. Please see EEO Report of Investigation Case No. GSA-03-NCR-WPS-GSA-2 and GSA Case No. 03-NCR-WPS-GSA-14

Interrogatory 4. Fully identify all damages including compensatory damages, that you attribute to the alleged sex, age, race, color or reprisal discrimination, or retaliation and fully identify your basis for such damages. This includes setting forth the specific sums attributable to each of the following:

Answer 4.

- a. medical expenses; N/A
- b. hospital expenses; N/A
- c. medication expenses; N/A
- d. permanent disability; N/A
- e. pain and suffering; \$100, 000.00
- f. anxiety; \$100,000.00
- g. psychological distress; \$100,000.00
- h. emotional distress; \$100,000.00
- i. mental anguish; \$100,000.00
- j. humiliation; \$100,000.00
- k. destruction of and lost earning capacity; \$200,000.00
- l. loss of love; \$200,000.00
- m. loss of companionship; \$100,000.00
- n. loss of society; \$100,000.00
- o. future medical expenses; **This is not known at this time, but will provide once it is known**
- p. future expenses for extra care; N/A
- q. future expenses for extra attendance; N/A
- r. limitations on the ability to find employment; and
- s. loss of enjoyment of life. \$500,000.00

Answer 4. Also Please see EEO Report of Investigation Case No. GSA-03-NCR-WPS-GSA-2 and GSA Case No. 03-NCR-WPS-GSA-14

Interrogatory 5. In relation to paragraph 7 of your complaint, fully identify and describe each act of harassment which you are alleging including the date, identity of the alleged harasser and all witnesses to the harassment, and all statements made and actions done.

Answer 5. Please see EEO Report of Investigation Case No. GSA-03-NCR-WPS-GSA-2 and GSA Case No. 03-NCR-WPS-GSA-14

Interrogatory 6. In relation to paragraph 7 of your complaint, fully identify and describe all work conditions which you allege were humiliating including the date and place of work condition and all witnesses to the work condition.

Answer 6. Please see EEO Report of Investigation Case No. GSA-03-NCR-WPS-GSA-2 and GSA Case No. 03-NCR-WPS-GSA-14, Statements of Complainant

Interrogatory 7. In relation to paragraph 7 of your complaint, fully identify and describe each act which you claim was undertaken to force you to retire including the date and place of the act, the identity of the person doing the act, all statements made, and all witnesses to the act.

Answer 7. Please see EEO Report of Investigation Case No. GSA-03-NCR-WPS-GSA-2 and GSA Case No. 03-NCR-WPS-GSA-14

Interrogatory 8. As to paragraph 8 of your complaint, fully identify and describe each occasion since 1995 on which you performed the duties of a Sergeant including the

date, number of hours worked, and description of duties.

Answer 8. Please See Report of Investigation GSA Case No. 03-NCR-WPS-GSA-14

Interrogatory 9. As to paragraph 9 of your complaint, fully identify and describe each condition and term of employment to which you were subjected which was not enforced on younger employees including the date and place, identity of individuals involved, and identity of the younger employees treated differently.

Answer 9. Please see EEO Report of Investigation Case No. 03-NCR-WPS-GSA-14

Interrogatory 10. As to paragraph 10 of your complaint fully describe and identify all "events surrounding the denial of Equal Pay" referred to, including the date, individual involved, and identity of any witnesses.

Answer 10. Please see EEO Report of Investigation Case No. GSA-03-NCR-WPS-GSA-2 and GSA Case No. 03-NCR-WPS-GSA-14

Interrogatory 11. As to paragraph 18 of your complaint fully describe and identify all "intolerable coercive actions by defendant" which allegedly forced you to retire.

Answer 11. Please see EEO Report of Investigation Case No. GSA-03-NCR-WPS-GSA-2 and GSA Case No. 03-NCR-WPS-GSA-14

Interrogatory 12. Fully identify and list each and every exhibit that is relevant to plaintiff's theory of the case. (Other than exhibits in the relevant EEO Reports of Investigation).

Answer 12. Affidavit of Norman Watkins-Short.

Interrogatory 13. Fully describe any statements by DHS employees or managers which you believe evidence discriminatory animus towards you based on sex, age,

race, color, or reprisal, this should include but not be limited to the date, actor, statement made, and witnesses thereto.

Answer 13. Please See EEO Report of Investigation Case No. GSA-03-NCR-WPS-GSA-2 and GSA Case No. 03-NCR-WPS-GSA-14

Interrogatory 14. As to each adverse action alleged, fully identify and describe the specific harm caused by the adverse action.

Answer 14. Please See EEO Report of Investigation Case No. GSA-03-NCR-WPS-GSA-2 and GSA Case No. 03-NCR-WPS-GSA-14. During this period, I experienced a great deal of stress in my marriage as a result of the problems that occurred on the job which resulted in my forced retirement.

II.

REQUEST FOR PRODUCTION OF DOCUMENTS

Request 1. True and correct copies of all documents which are referenced in, support, or are described in any of the answers to the above interrogatories.

Request 2. All documents that support your claim that DHS discrimination against you on the basis of sex, age, race, color and reprisal.

Request 3. All documents that show individuals were treated more favorably than you as alleged in your complaint.

Request 4. All documents relating to any adverse action that you allege was taken against you by DHS.

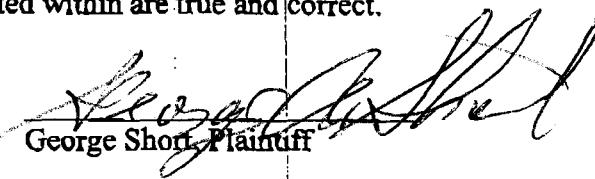
Request 5. All documents that relate to or support your claim for damages.

Request 6. All documents that relate to or support your claim in paragraph 8
that defendant disapproved your leave request to take your wife to the hospital
for emergency surgery.

**All Documents relevant to the above request for production have been produced.
Please See EEO Report of Investigation Case No. GSA-03-NCR-WPS-GSA-2 and
GSA Case No. 03-NCR-WPS-GSA-14**

VERIFICATION

I George Short verify that the facts stated within are true and correct.



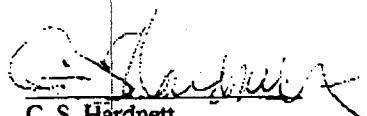
George Short, Plaintiff



C. S. Hardnett
Attorney for Plaintiff
1111 Bonifant Street
Silver Spring, Maryland 20910

CERTIFICATE OF SERVICE

I certify that a copy of the Answers to Defendant's Original Set of Interrogatories and Request for Production of Documents was served on Rhonda Fields, Attorney for Defendant, United States Attorney, Civil Division, 555 Fourth Street, N. W. 20530 by fax to fax number (202)-514-8780 on July 17, 2007.



C. S. Hardnett